RCRA Subtitle I Inspection Report

UST Compliance Inspection

Pepco Benning Road Generating Station
3400 Benning Road, NE
Washington, DC 20010

Telephone Number: 202-872-2000

Date of Inspection: June 9, 2010

Facility Identification Number: 7000585

Facility Location: 38° 53.9'N, 076° 57.3'W

EPA Representative:	Austin Brett, Environmental Scientist, Contractor, 703-390-0606
Tank Owner:	Potomac Electric Power Company
Tank Owner Representative:	Fariba Mahvi, Lead Engineer, 202-331-6641

Inspector

Austin Brett

Ms. Austin Brett

Background

On June 9, 2010, the United States Environmental Protection Agency (EPA), Region 3, Land and Chemicals Division, represented by its contractor, Ms. Austin Brett of Tetra Tech EM, Inc. (Tetra Tech), conducted a Compliance Evaluation Inspection (CEI) of the Potomac Electric Power Company (Pepco) Benning Road Generating Station located at 3400 Benning Road, NE in Washington, DC to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA).

Inspection Observations

Inspection Procedures. Ms. Joanne Cassidy, EPA Region 3 Work Assignment Manager, contacted a representative of this facility during the week of May 24, 2010, to schedule the inspection of the facility. Ms. Brett conducted the inspection on June 9, 2010. Upon arrival at the facility, Ms. Brett provided her credentials to Ms. Fariba Mahvi, Lead Engineer, and explained the scope and purpose of the inspection. After completing the inspection, Ms. Brett completed the Region 3 Underground Storage Tank (UST) Compliance Checklist, which is included as Attachment 1 to this report.

Tank Descriptions. The Pepco Benning Road Generating Station has two USTs (see table 1), which store gasoline and diesel fuel. According to the notification to the District of Columbia Department of the Environment (DDOE), Tank 1, installed in May 1975, is single-walled fiberglass reinforced plastic (FRP) and Tank 2 , installed in June 1991, is double-walled, Buffhide steel with fiberglass-reinforced plastic (FRP). According to the DC notification, both tanks are 20,000 gallons in capacity and supply fuel to the dispensers via double-walled flexible plastic pressurized piping. See the site diagram sketch in Attachment 1 for an overview of the facility. Attachment 2 contains site photographs.

Tank Release Detection. Releases from the tanks are detected by a Veeder Root (VR) TSL-350R monitoring system that conducts Automatic Tank Gauging (ATG). UST alarms appear on the VR system located outside near the tankfield. During the inspection, the VR monitor stated that all functions were normal. Attachment 3 contains VR monitor printouts obtained during the inspection. A monitor training certification was provided during the site inspection and is included in Attachment 4. In addition, documentation from the 2009 annual maintenance checklist is included in Attachment 5. This documentation indicates that the VR was functioning properly at the time of the maintenance check. Attachment 6 is the FMS Site Compliance Report which contains the tank release detection test results from June 2009 to April 2010. The monitoring records show that 0.2 gallon per hour (GPH) tank leak detection tests were conducted monthly for each of the last 11 months.

The inspector observed an interstitial monitoring probe near the diesel fill pipe; however Ms. Mahvi indicated that it was not connected to the VR system and is therefore inactive.

Table 1
Underground Storage Tank and Piping Details for the 3400 Benning Road, NE Pepco Benning Road Generating Station

Tank No.	Material Stored	Capacity (gallons)	Installation Date	Tank Construction Material	Piping Construction Material
1	Gasoline	20,000	May 1975	SW FRP	FLEX DW
2	Diesel	20,000	June 1991	DW Steel with FRP	FLEX DW

Notes:

FRP – Fiberglass-reinforced plastic.
FLEX – Flexible Plastic
DW – Double-walled
SW-Single-walled

Piping Release Detection. The pressurized piping for both tanks was installed with VR electronic automatic line leak detectors (ALLD). The serial numbers of the ALLD were unreadable.

The VR conducts periodic ALLD line leak tests and line tightness tests on each tank. Attachment 7 shows the ALLD link leak passed test results since May 20, 2010. The FMS Site Compliance Report in Attachment 6 shows the passing test results for line tightness testing.

Releases from the pressurized piping are detected by liquid sensors located in the manway access sumps and dispenser sumps. The sump sensors are connected to the VR monitoring system. The liquid sensors could not be tested during the inspection because the sumps were too deep to access.

Spill/Overfill Prevention. The inspector observed an overfill cutoff valve in the original fill pipe for both tanks. According to Ms. Mahvi, the new fill pipes were installed to meet DC's spill bucket requirements. The new fill pipes connect underground to the original fill where the overfill cutoff valve is located. See the site diagram sketch in Attachment 1 for the location of the fill pipe and existing fill pipe. The inspector also observed a spill bucket surrounding each fill pipe. In addition, the tanks are equipped with a high-level alarm adjacent to, and in sight of, the fill area. The alarm sounded when tested; however, the sound was difficult to hear over basic background noise.

Cathodic Protection. The DDOE facility notification indicates that all tanks at the facility are either single-walled FRP or double-walled steel with FRP tanks. The EPA inspector observed the transfer piping for all tanks entering the ground to be double-walled, flexible, plastic piping.

Financial Assurance. The facility is insured through Associated Electric & Gas insurance Services Limited (Policy Number X2660A1A09).

Used Oil. The facility does not accumulate used oil on site.

Other USTs. The inspector did not observe any other USTs at the facility.

Attachments

1. Region 3 UST Compliance Checklist
2. Photo Log
3. Veeder-Root Monitor Printouts
4. Veeder-Root Monitor Training Certificate
5. 2009 Annual Maintenance Checklist
6. FMS Site Compliance Report
7. Veeder-Root Line Leak Test Results
8. Proof of Financial Assurance

Attachment 1:
Region 3 UST Compliance Checklist

Facility ID Number 7000585

Leak Detection Inspection Checklist

I. Ownership of Tank(s)	II. Location of Tank(s)
Potomac Electric Power Company	Benning Road generating station 3400 Benning Rd. NE Washington, DC 20019 **Number of Tanks at This Location:** 2

III. Tank Information – Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

Tank presently in use (circle)	Tank 1	Tank 2	Tank 3	Tank 4
If not, date last used				
If emptied, verify 1" or less of product in tank				
Month and Year Tank Installed	May 1975	June 1991		
Material of Construction tank/pipe	SW FRP/DW Flex Plastic	DW Steel/FRP/ DW flex plast.		
Capacity of Tank (in gallons)	20,000 g	20,000 g.		
Substance Stored	reg. gas	diesel		
IV. A. Release Detection For Tanks – Check the release detection method(s) used for each tank or N/A if none required				
Manual Tank Gauging (tanks under 1,000 gal.)				
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)				
Tank Tightness Testing and Inventory Control				
Automatic Tank Gauging	✓	✓		
Vapor, Groundwater or Interstitial Monitoring				
Other approved method (SIR)				
IV. B. Release Detection For Piping – Check the release detection method(s) used for piping				
Check Pressurized (P) or Suction (S) Piping for each tank	P	P		
Automatic Line Leak Detectors, **and** check one	✓	✓		
Vapor or Groundwater Monitoring				
Secondary Containment with Monitoring				
Line Tightness Testing	✓	✓		

I Austin Brett (print name) certify that I have inspected the above named facility on 6/9/10 month/day/year

Inspector's Signature: [signature]

Date: 6/9/10

Facility ID Number 7000585

Leak Detection for Piping

Pressurized Piping A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional tanks.

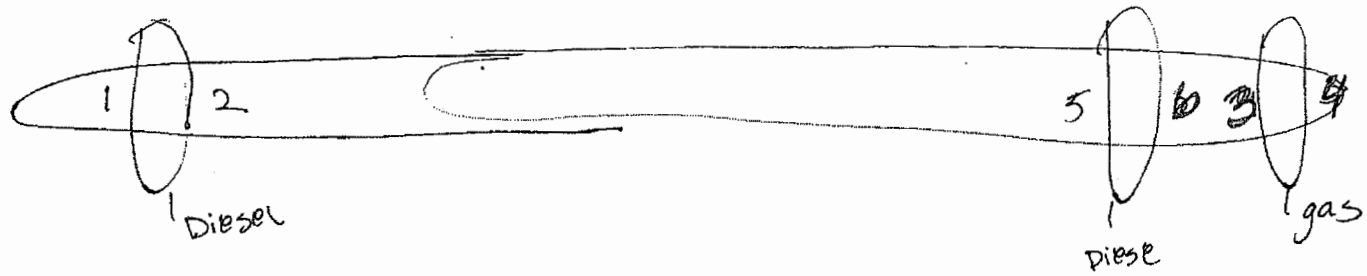
Set 1	Tank 1	Tank 2	Tank 3	Tank 4
Automatic Flow Restrictor				
Automatic Shut-off Device	✓	✓		
Continuous Alarm System				
and				
Set 2				
Annual Line Tightness Testing	✓	✓		
Interstitial Monitoring				
If Interstitial Monitoring, documentation of monthly monitoring is available				
Ground-Water or Vapor Monitoring				
If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available				
Other Approved Method (specify in comments section)				
Suction Piping Indicate date of most recent test				
Line Tightness Testing (required every 3 years)				
Secondary Containment with Interstitial Monitoring				
Ground-Water or Vapor Monitoring				
Other Approved Method (specify in comments section)				
No Leak Detection Required (must answer yes to all of the following questions)				
Operates at less than atmospheric pressure				
Has only one check valve, which is located directly under pump				
Slope of piping allows product to drain back into tank when suction released				
All above information on suction piping is verifiable				

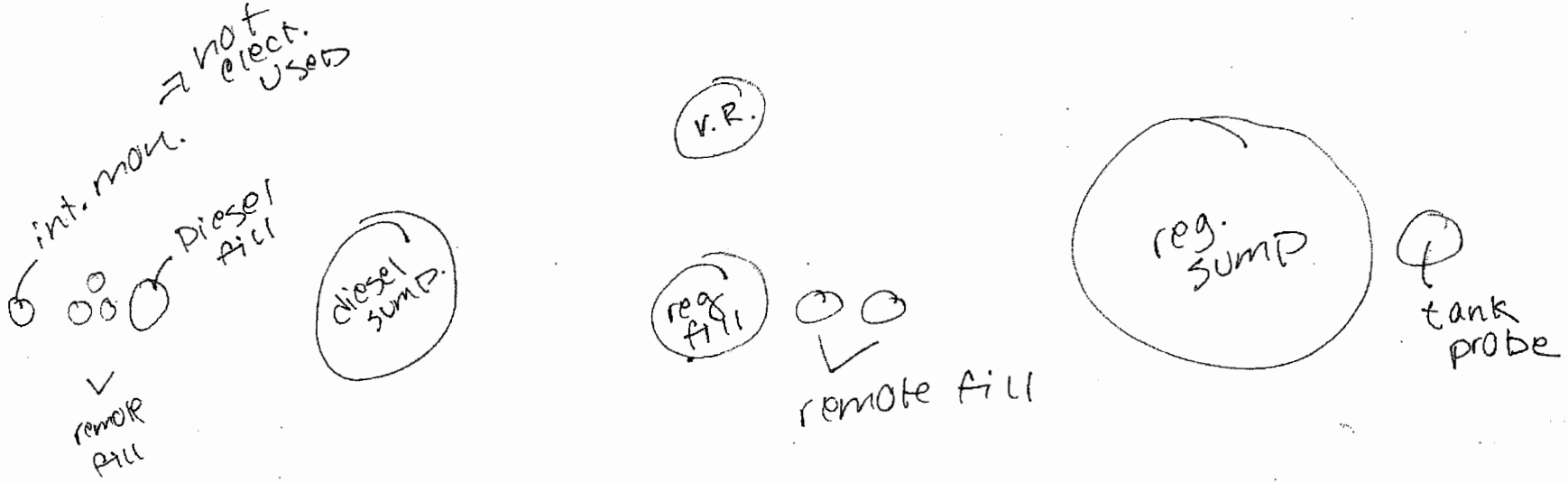
On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

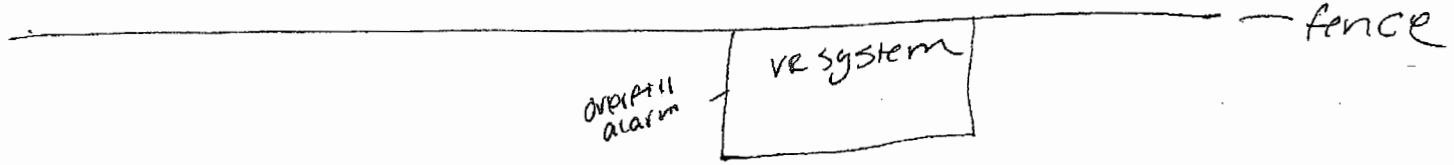
Comments: Diesel OPW VR P/N 51020C-952

Inspector's Signature: _____ Date: ___

Site Sketch/Photo Log







Facility ID Number

Automatic Tank Gauging

Manufacturer, name and model number of system: Veeder Root TLS 350R

Please answer yes or no for each question		
Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).	(Yes) G	No G
Device can measure height of product to nearest one-eighth of an inch.	(Yes) G	No G
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	(Yes) G	No G
Documentation is available that the ATG was in test mode a minimum of once a month.	(Yes) G	No G
Checked for presence of gauge in tanks.	(Yes) G	No G
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	(Yes) G	No G
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	(Yes) G	No G
Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.	(Yes) G	No G
Maintenance records are available upon request.	(Yes) G	No G
Monthly testing records are available for the past 12 months.	(Yes) G	No G
Daily monitoring records are available for the past 12 months (if applicable). N/A	Yes G	(No) G

Comments: interstitial probe there, but not connected
Tank leak detection available for all months

Inspector's Signature: _____ Date: _____

Facility ID Number

Spill/Overfill Prevention	Tank 1	Tank 2	Tank 3	Tank 4
Are all tank transfers less than 25 gallons?	Yes G (No G)	Yes G No G	Yes G No G	Yes G No G
Spill Prevention				
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	(Yes G) No G	Yes G No G	Yes G No G	Yes G No G
Overfill Prevention				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Butterfly valve (in fill pipe)	(Yes G) No G	Yes G No G	Yes G No G	Yes G No G
Automatic alarm monitoring is used	(Yes G) No G	Yes G No G	Yes G No G	Yes G No G
Other alarm system_____	Yes G No G	Yes G No G	Yes G No G	Yes G No G

remote fill contains the flapper valve

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES ✓ NO __ (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.)

Cathodic Protection N/A	Tank 1	Tank 2	Tank 3	Tank 4
Sacrificial Anode System				
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes G No G	Yes G No G	Yes G No G	Yes G No G
The last two test results are available. (Tests are required every three years.)	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Impressed Current				
Rectifier is on 24 hours a day?	Yes G No G	Yes G No G	Yes G No G	Yes G No G
The last two test results are available? (Tests are required every 60 days.)	Yes G No G	Yes G No G	Yes G No G	Yes G No G
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes G No G	Yes G No G	Yes G No G	Yes G No G

Comments:_____

Inspector's Signature: _____ Date: __

Facility ID Number N/A

Inventory Control and Tank Tightness Testing

Method of tank tightness testing: _____
Address of tank tightness tester: _____

Please complete all information for each tank. If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				
Overages or shortages are less than 1% + 130 gals of tank's flow-through volume.				
If no, which months were not?				

Please answer yes or no for each question		
Owner/operator can explain inventory control methods and figures used and recorded.	Yes G	No G
Records include monthly water monitoring.	Yes G	No G
Tank inventory reconciled before and after fuel delivery.	Yes G	No G
Books are reconciled monthly.	Yes G	No G
Appropriate calibration chart is used for calculating volume.	Yes G	No G
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes G	No G
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes G	No G
Owner can demonstrate consistency in dipsticking techniques.	Yes G	No G
The dipstick is long enough to reach the bottom of the tank.	Yes G	No G
The ends of the gauge stick are flat and not worn down.	Yes G	No G
The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes G	No G
The tank has been tested within the year & has passed the tightness test (if necessary).	Yes G	No G
A third-party certification of the tank tightness test method is available.	Yes G	No G
Tank tester complied with all certification requirements.	Yes G	No G
Monitoring and testing are maintained and available for the past 12 months.	Yes G	No G

Comments: _____

_____

_____

_____

Inspector's Signature: _____ Date: _

Facility ID Number N/A

Vapor Monitoring

Name of monitoring device:_____

Date system installed _____ Number of monitoring wells _____

Distance of monitoring well(s) from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by:_____

Location of site assessment documentation:_____

Please indicate yes or no for each tank – Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.				
Well caps are tight.				
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.				
Well is free of debris or has other indications that it has been recently checked.				

Please answer yes or no for each question

UST excavation zone was assessed prior to vapor monitoring system installation.	Yes G	No G
One or more USTs is/are included in system.	Yes G	No G

If the system is automatic, check the following:

Power box is accessible and power light is on.	Yes G	No G
Documentation of monthly readings is available for last 12 months.	Yes G	No G
Equipment used to take readings is accessible and functional.	Yes G	No G
Vapor monitoring equipment has been calibrated within the last year.	Yes G	No G

If the system is manual, check the following:

Documentation of monthly readings is available for last 12 months.	Yes G	No G
Equipment used to take readings is accessible and functional.	Yes G	No G
Vapor monitoring equipment has been calibrated within the last year.	Yes G	No G
Porous material was used for backfill.	Yes G	No G
Wells are placed within the excavation zone.	Yes G	No G
Level of background contamination is known. If so -- what is level?	Yes G	No G

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

_____

_____

Inspector's Signature: _____ Date: ___

Facility ID Number N/A

Manual Tank Gauging

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 & 4):_____

Please answer yes or no for each question		
Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.	Yes G	No G
Level measurements are based on average of two consecutive stick readings at both beginning and end of period.	Yes G	No G
Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.	Yes G	No G
Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.	Yes G	No G
Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.	Yes G	No G
MTG is used as sole method of leak detection for tank.	Yes G	No G
MTG is used in conjunction with tank tightness testing.	Yes G	No G
Are all tanks for which MTG is used under 2,000 gallons in capacity?	Yes G	No G
Are monitoring records available for the last 12 month period?	Yes G	No G

Check One:	Nominal Tank Capacity (In gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
( )	**110-550**	**N/A**	**5**	**36 hours**
( )	**551 - 1,000***	**N/A**	**7**	**36 hours**
( )	**1,000***	**64" diameter x 73" length**	**4**	**44 hours**
( )	**1,000***	**48" diameter x 128" length**	**6**	**58 hours**
( )	**1,001 - 2,000***	**N/A**	**13**	**36 hours**

* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments:_____

_____

_____

Inspector's Signature: _____ Date:_____

Facility ID Number N/A

Ground Water Monitoring

Date System Installed: _____

Distance of well from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Distance of well from piping (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please answer each question of each well. If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.

	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.				
Well was opened and presence of water was observed in well at depth of _____ ft.				

Please answer yes or no for each question

Wells are used to monitor piping.	Yes G	No G
Site assessment was performed prior to installation of wells.	Yes G	No G
Documentation of monthly readings is available.	Yes G	No G
Specific gravity of product is less than one.	Yes G	No G
Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to:	Yes G	No G
Groundwater is not more than 20 feet from ground surface.	Yes G	No G
Wells are sealed from the ground surface to top of filter pack.	Yes G	No G
Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well.	Yes G	No G
Groundwater is monitored: ( ) Manually on a monthly basis. ( ) Automatically (continuously or monthly basis [Circle one]).		
Check the following if groundwater is monitored manually: Bailer used is accessible and functional.	Yes G	No G
Check the following if groundwater is monitored automatically: Monitoring box is operational.	Yes G	No G
Checked for presence of sensor in monitoring well.	Yes G	No G

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

_____

_____

Inspector's Signature: _____ Date: _____

Facility ID Number N/A

Interstitial Monitoring

Manufacturer and name of system: _____

Date system installed: _____

Materials used for secondary barrier: _____

Materials used for internal lining: _____

Interstitial space is monitored (Circle one): automatically, continuously, monthly basis.

Please answer yes or no for each question.			
All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes G	No G	N/A G
System is designed to detect release from any portion of UST system that routinely contains product.	Yes G	No G	N/A G
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes G	No G	N/A G
Documentation of monthly readings is available for last 12 months.	Yes G	No G	N/A G
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes G	No G	N/A G
Monitoring box, if present, is operational.	Yes G	No G	N/A G
If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering.	Yes G	No G	N/A G
Interstitial space is monitored manually on monthly basis (answer the following question).	Yes G	No G	N/A G
Equipment used to take readings is accessible and functional.	Yes G	No G	N/A G
Tank is double-walled	Yes G	No G	N/A G
Tank is fitted with internal bladder to achieve secondary containment (answer the following question).	Yes G	No G	N/A G
Bladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes G	No G	N/A G
Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions).	Yes G	No G	N/A G
Secondary barrier is always above groundwater.	Yes G	No G	N/A G
If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such conditions.	Yes G	No G	N/A G
Secondary barrier is constructed from artificially constructed material, with permeability to substance < 10^6 cm/sec.	Yes G	No G	N/A G
Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance.	Yes G	No G	N/A G
Secondary barrier does not interfere with operation of cathodic protection system.	Yes G	No G	N/A G

Comments: _____

Inspector's Signature: _____ Date: _____

Facility ID Number N/A

Statistical Inventory Reconciliation

Please complete all information for each tank. If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				

Please answer yes or no for each question

Records include monthly water monitoring.	Yes G	No G
Tank inventory reconciled before and after fuel delivery.	Yes G	No G
Appropriate calibration chart is used for calculating volume.	Yes G	No G
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes G	No G
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes G	No G
Answer one of the following three:		
1) Owner can demonstrate consistency in dipsticking techniques.	Yes G	No G
a) The dipstick is long enough to reach the bottom of the tank.	Yes G	No G
b) The end of the gauge stick is flat and not worn down.	Yes G	No G
c) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.	Yes G	No G
OR		
2) Automatic tank gauge is used for readings.	Yes G	No G
OR		
3) Other method is used for readings (explain in comment section below).	Yes G	No G
A third-party certification of the SIR method is available.	Yes G	No G
Monitoring and testing records are maintained and available for the past 12 months.	Yes G	No G

Comments: _____

_____

_____

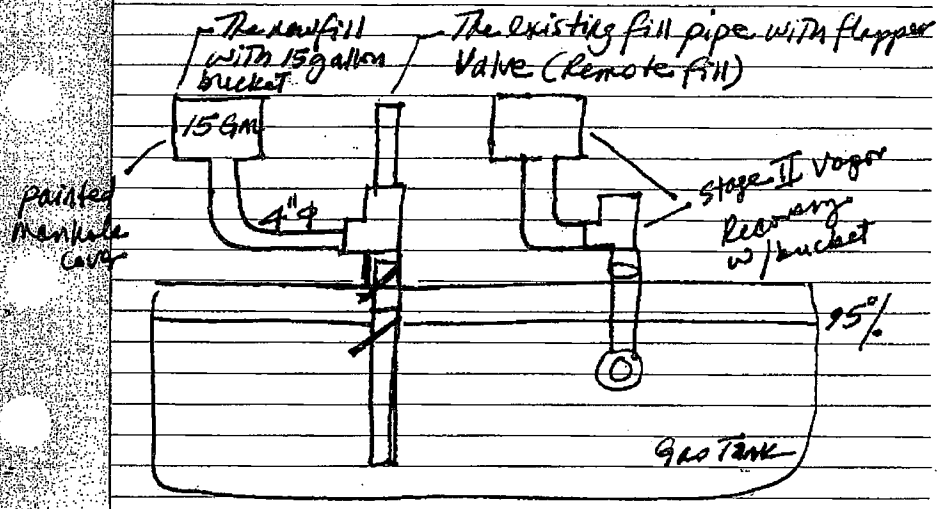
Inspector's Signature: _____ Date: _____

L shape 12 way duct boots (when bleeding water main)

3/11/08

Benning: Gas + Diesel Tanks

Remote overfill flapper valve: See pictures taken by KEG petroleum and sent to ERG (Andrew Lee). Pictures are stored in the UST folder.



The flapper valve is located in the existing fill. New fill was installed because DC required a 10 gallon spill bucket and there was no 10 gallon in the market, so we had to purchase 15 gallon and install a 15 gallon with a new fill which is connected to the existing fill via a 4" pipe. Delivery is via the new fill. Flapper valve stops the delivery at 95% of tank volume.

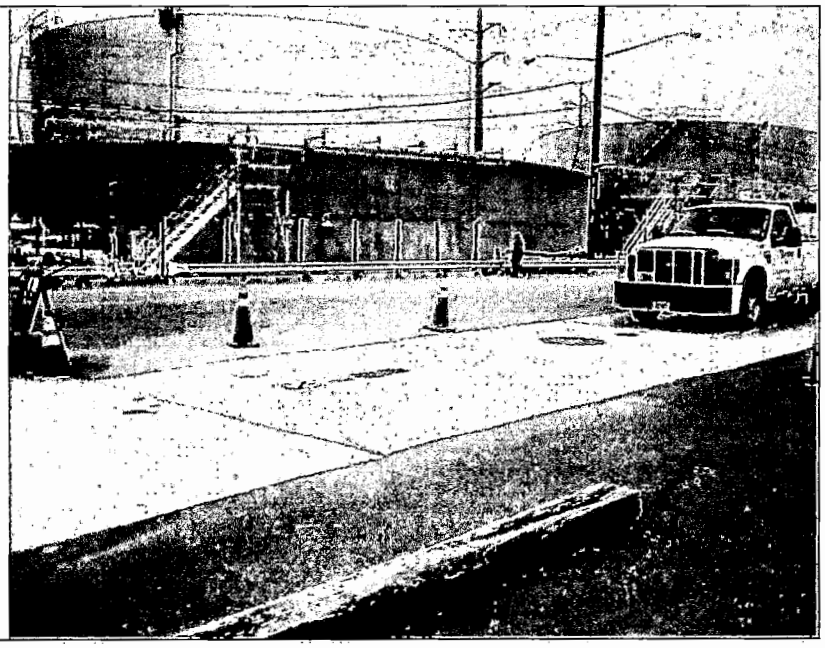
Photo: 1 **Date: June 9, 2010** **Description: View of the surface features of Tank 1.**	

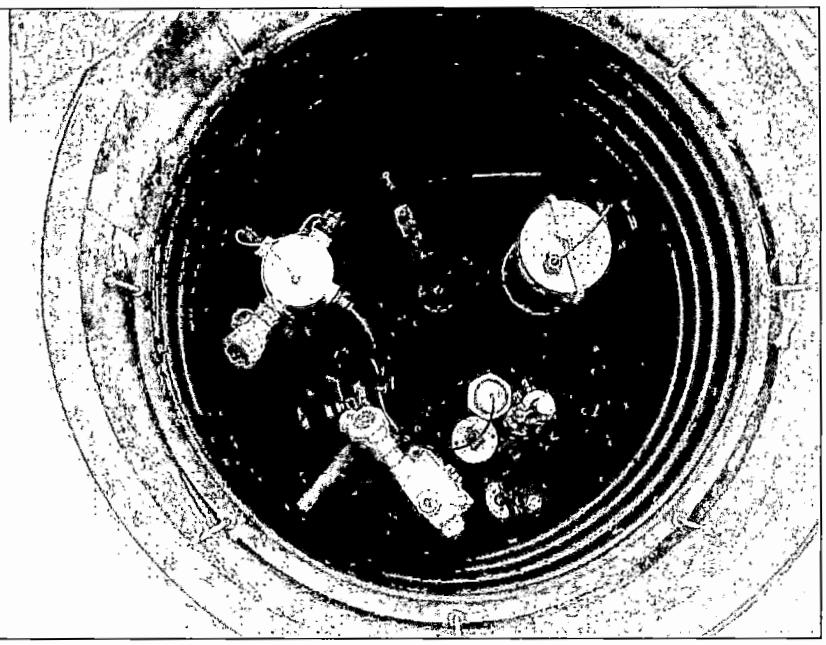
Photo: 2 **Date: June 9, 2010** **Description: View of the sump for Tank 1.**	

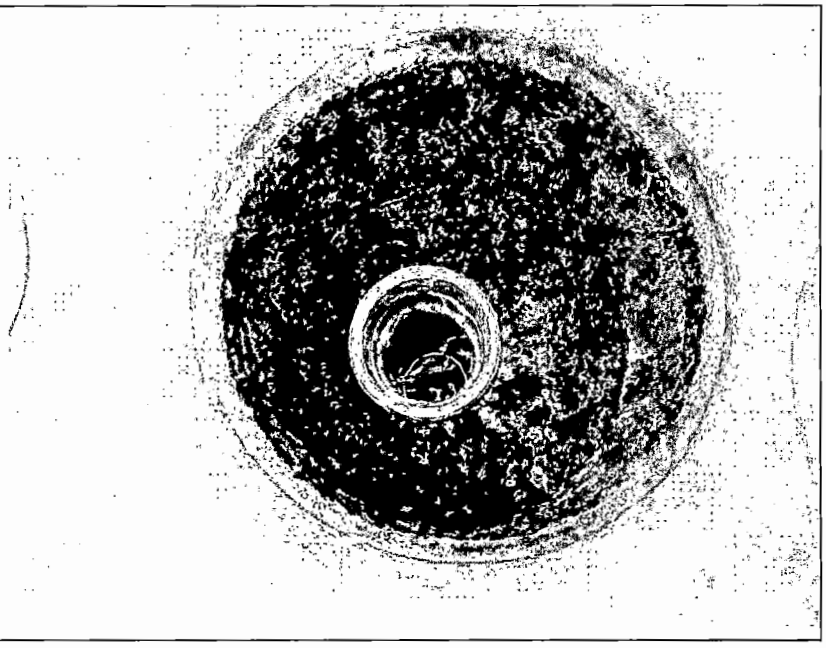
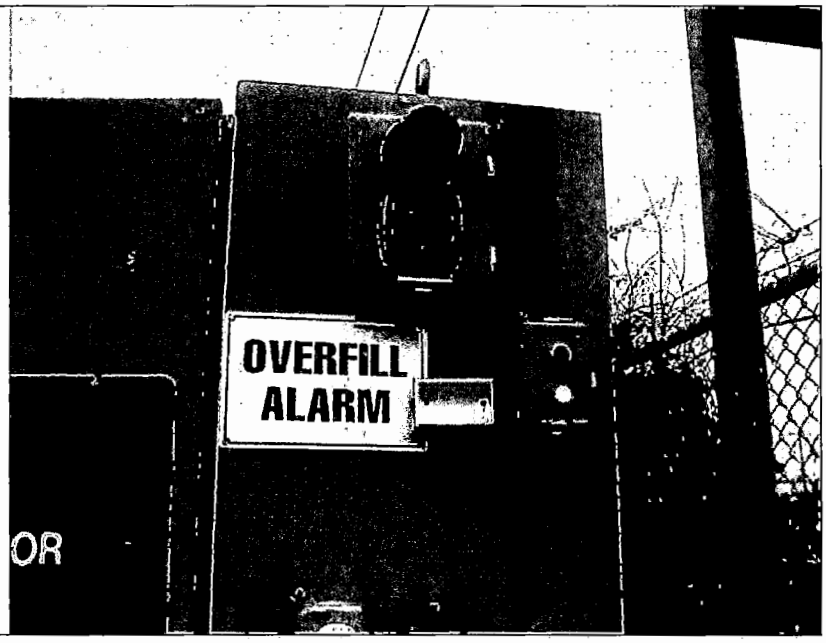
Photo: 3 **Date: June 9, 2010** **Description: View of the original fill pipe for Tank 1.**	

Photo: 4 **Date: June 9, 2010** **Description: View of the overfill alarm located adjacent to the tank field.**	

Attachment 3:
Veeder-Root Monitor Printouts

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:53 AM

INVENTORY REPORT

T 1:DIESEL
VOLUME = 15532 GALS
ULLAGE = 4444 GALS
90% ULLAGE= 2446 GALS
TC VOLUME = 15449 GALS
HEIGHT = 91.03 INCHES
STK HEIGHT= 90.78 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 71.9 DEG F

T 2:UNLEADED
VOLUME = 8980 GALS
ULLAGE = 10996 GALS
90% ULLAGE= 8998 GALS
TC VOLUME = 8939 GALS
HEIGHT = 55.01 INCHES
STK HEIGHT= 55.76 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 66.6 DEG F

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:55 AM

LIQUID STATUS

JUN 9, 2010 11:55 AM

L 1:DIESEL STP SUMP
SENSOR NORMAL

L 2:UNLEADED STP SUMP
SENSOR NORMAL

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:53 AM

LEAK TEST REPORT

T 1:DIESEL
PROBE SERIAL NUM 319111

MOST RECENT AVERAGED
TEST STARTING TIME:
APR 16, 2010 11:47 PM

AVG LENGTH = 2.0 HRS
AVG VOLUME =15242.3 GAL

AVG LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:54 AM

CSLD TEST RESULTS

JUN 9, 2010 11:54 AM

T 1:DIESEL
PROBE SERIAL NUM 319111

0.2 GAL/HR TEST
PER: JUN 9, 2010 PASS

T 2:UNLEADED
PROBE SERIAL NUM 747888

0.2 GAL/HR TEST
PER: JUN 9, 2010 PASS

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:53 AM

LEAK TEST REPORT

T 2:UNLEADED
PROBE SERIAL NUM 747888

MOST RECENT AVERAGED
TEST STARTING TIME:
APR 16, 2010 11:47 PM

AVG LENGTH = 2.0 HRS
AVG VOLUME =15706.3 GAL

AVG LEAK TEST RESULTS
0.20 GAL/HR TEST PASS

* * * * * END * * * * *

Attachment 4:
Veeder-Root Monitor Training Certificate

Technical Training Certification

Certificate of Completion

This certificate is issued in recognition that

Keith E. Griffin
Technician #A24421

has satisfactorily completed

Veeder-Root Startup & Service Technician (Level 4)
in
TLS-3XX UST Monitoring Systems
(Including Secondary Containment Vacuum Sensing - CA only)

Lewis Bell, Technical Training Manager

VEEDER-ROOT

11/9/2008
Date of Issue

11/9/2010
Expiration Date

Print

VEEDER-ROOT Certified Technician
The bearer of this card has successfully completed a manufacturer training course in the listed product(s).
Keith E. Griffin
Technician #A24421
Expires: 11/9/2010
Certified UST Monitoring Technician
(Incl. Secondary Containment Vacuum Sensing - CA only)
You may contact TechnicalTraining@gilbarco.com to confirm the current certification record for this person.

Attachment 5:
2009 Annual Maintenance Checklist

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

INSTRUCTIONS FOR
CONTRACT TECHNICIANS SERVICING FUEL ISLAND FACILITIES

	PLACE X IN BOX DONE
1) Inform Vehicle Resource Management (VRM) contact (see attached contact list) prior to arrival and notify on-site contact of your arrival at the facility. Explain number of personnel on-site and outline work plan for the day.	☑
2) Ask the on-site contact for a contractor pass for each contractor employee on-site.	☑
3) Inform the on-site contact if there is scheduled testing of the Veeder Root silent and audible alarms.	☑
4) All OSHA and PHI safety rules & guidelines are to be followed. Personal Protective Equipment is to worn. Appropriate fire extinguisher must be available within 20 feet of work in progress.	☑
5) If the fuel island dispensers are to be Out of Service or the driveway area blocked inform the on-site contact first.	☑
6) Defects / problems found during the site work needing prompt attention are to be reported. Call Ed Aiken @ 302-454-4071 or Andy Ross @ 302-454-4512 and notify the on-site contact. Complete repairs if possible while on-site.	☑
7) Defects / problems found not requiring prompt attention are to be noted on the checklist with recommendations for resolution.	☑
8) Inform Veeder Root of activities involving the Veeder Root systems before starting and when completed.	☑
9) When leaving the site for any reason please inform the on-site contact and provide your estimated time of return.	☑
10) Submit one signed copy of all inspection checklists to VRM Administration (Ed Aiken) along with invoice. Provide copy of appropriate Veeder Root printouts collected during PM work.	☑

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

SITE NAME: Benning DATE: 8/26/09

VEEDER ROOT SITE ID# 261240

FUEL FORCE SITE ID# _____

SERVICE COMPANY K+G Petroleum TECHNICIAN Keith Griffin

1 INSPECTION OF PRODUCT DISPENSERS / PUMPS

1.1 Inspect hose retrievers for frayed or broken cables. Verify proper operation.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.2 Inspect each hose for leaks, abuse and excessive wear.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed: Replaced torn 8'-6" coaxial hose on grs #3

1.3 Inspect nozzles for wear or damage, leaks, loose nozzle spouts, missing parts, splash guards.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.4 Inspect vapor recovery boot bellows (if Stage II equipped) for proper seal and damage.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.5 Inspect breakaways, couplings, and swivels for leaks, cracks, or wear.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.6 Inspect dispenser electronic displays for operation and panel lighting (if equipped).
N/A Inspected & Maintained: ☐ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.7 Remove covers and inspect all fuel fittings, meters, valves and seals for leaks. Repair and test as needed.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

1.8 Replace fuel filters & remove inspect & clean product strainers at each dispenser (note date on filter).
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.9 Inspect, test and lubricate shear valves. Provide documentation of test procedure and results.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.10 Inspect dispenser mechanical displays for operation and panel lighting (if equipped). Lubricate moving parts.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

N/A 1.11 For dispensers with pumps (NJ only): Inspect pump pulleys for excessive wear and excessive bearing play. Inspect belts for fraying/cracks.
Inspected & Maintained: ☐ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.12 Lubricate dispenser cover lock cylinders with graphite lubricant.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

1.13 Clean dispenser with automobile cleaning products. Do not wash with hose. Do not use ammonia products on electronic displays. Clean plastic with water and mild detergent.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.32.2.1

1.14 Inspect dispenser sumps (if present) for integrity. Clean and remove any debris and product or water. Note quantity of product/water removed and location. Containerize product for disposal.
Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

2 INSPECTION OF VEEDER-ROOT TLS350/350R SYSTEM

DE UST regulations Part B, sections 2.9.4.4.1 and 2.9.5.1.5.1

2.1 Check console printer for operation & sufficient thermal paper. Repair / replace as needed.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

2.2 Print out the TLS inventories & verify with actual inventories (report results to Veederroot for correction)
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.9.4.4.2 and 2.9.5.1.5.2

2.3 Print out and check TLS set up values and verify that current time/day is correct.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.9.4.4.2 and 2.9.5.1.5.2

2.4 Verify TLS has proper high water warning (1.5") and alarm (2") levels set.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.9.4.4.2 and 2.9.5.1.5.2

2.5 Verify TLS battery back up is working. Note if no battery backup is present.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.9.4.4.3-4 and 2.9.5.1.5.3-4

2.6 Test console to verify power, warning & alarm indicators lights are working & audible/visual remote alarm functions as intended.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.9.4.4.6 and 2.9.5.1.5.6

2.7 Inspection of all cables that are visible for cracking or swelling. Verify epoxy packs on field wiring are in serviceable condition.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

DE UST regulations Part B, sections 2.9.5.1.5.5 and 2.28

2.8 Remove and test magnetostrictive probes and all sump sensors in accordance with manufacturer's specifications. Verify that probes and sensors are functioning as intended.

Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, section 2.28

2.9 N/A Inspect interstitial sensors in accordance with manufacturer's specifications. Verify that sensors are functioning as intended.

Inspected & Maintained: ☐ OK ☐ Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, section 2.20.1.4

2.10 Perform 3 gph function test (@10psi for one hour) on automatic line leak detectors in accordance with manufacturer's test protocols.

Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed: To be performed by testing contractor

---

2.11 Verify sump sensors are installed correctly (within 1" of sump bottom).

Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

3 Inspection of MultiForce Fuel Management System

3.1 Verify condition & proper operation of fuel island terminal key pad & display (including display heater).
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.2 Verify condition of fuel island terminal enclosure lock, door seal, sun screen & remove any foreign debris.
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.3 Verify Fuel Force program is running - green light on reset module is flashing
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.4 Verify RED, GREEN and YELLOW indicator lights on 4-hose board are "on" when dispenser hook switch is activated.
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.5 Check operation of Fuel Force internal heaters (if present) and temperature control. Note presence or absence of cabinet heaters and/or internal light bulbs.
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.6 Check operation of Fuel Force terminal cooling fan, clean or replace fan air filter
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.7 Verify the Fuel Force console back up power supply (UPS) is in working condition (if present). If no backup power supply is present please note in comments below.
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

3.8 Verify key activated By-Pass system is functional. Lubricate By-Pass key lock cylinder and door lock.
Inspected & Maintained: [V] OK [ ] Note comments/observations below.

Comments/Service Performed:

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

4 Inspection of Ancillary Equipment

DE UST regulations Part B, sections 2.32.2.2

4.1 Remove tank sump covers. Remove any debris and visually inspect sump. Is sump cover missing any hold down hardware? Is gasket intact and pliable? Remove and dispose of any water in sump. Remove and containerize any product found. Note quantity and location of water/product remove in comments.

Inspected & Maintained: ☐ OK ☑ Note comments/observations below.

Comments/Service Performed: The gas sump cover does not seal properly

DE UST regulations Part B, sections 2.32.2.3

4.2 Inspect all tank access ports to make sure that all covers, caps and adaptors are tightly sealed. Inspect electrical wiring and connections for excessive corrosion. Note in comments any observations.

Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

DE UST regulations Part B, sections 2.32.2.4

4.3 Verify integrity of all overfill spill containers. Remove any water/product present. Containerize product for disposal. Note location and amount of product removed in comments. Are the caps/adaptors tight? Is there a lock on fill cap? Is tank capacity and product clearly defined?

Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

4.4 Repaint all fill and vapor recovery covers with color coding per API 1637. Inspect gaskets and replace as needed.

Inspected & Maintained: ☐ OK ☑ Note comments/observations below.

Comments/Service Performed: Will color code manhole covers at later date

4.5 Inspect all fuel island overhead and dispenser lighting for proper operation. Note overhead lighting deficiencies. Repair dispenser lighting as needed.

Inspected & Maintained: ☐ OK ☑ Note comments/observations below.

Comments/Service Performed: One overhead light not working

4.6 Test fuel island Emergency Stop (E-Stop) for proper operation (repair as needed)

Inspected & Maintained: ☑ OK ☐ Note comments/observations below.

Comments/Service Performed:

4.7 Confirm appropriate fire extinguishers (size and type) are present & inspection is current. Report any deficiencies in comments.

Inspected & Maintained: ☐ OK ☑ Note comments/observations below.

Comments/Service Performed: Extinguishers are present. No gauge or inspection tag to indicate if extinguisher are properly charged

PEPCO HOLDINGS INC VEHICLE RESOURCE MANAGEMENT
FUEL FACILITY PREVENTATIVE MAINTENANCE CHECKLIST

4.8 Perform inventory check of spill kit in plastic drum. Note any deficiencies.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

4.9 Check tank water levels. Pump out and containerize water if quantity meets or exceeds regulatory limits.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

4.10 Verify appropriate signage. Is the API color coding sign mounted? Is there a sign for the tank overfill alarm? Note any deficiencies in comments.
Inspected & Maintained: [ ] OK [✓] Note comments/observations below.

Comments/Service Performed: No sign for tank overfill alarm. Need diesel signage

---

4.11 Visually inspect aboveground vent caps. Is pressure/vacuum valve in use for gasoline vent? Is open vent in use for diesel vent?
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

N/A 4.12 Inspect Kiosk if clean of debris. Is lighting and heating functional? Evidence of water damage? Check roofing and drains for problems. Note any other observations or needed repairs.
Inspected & Maintained: [ ] OK [ ] Note comments/observations below.

Comments/Service Performed:

4.13 Inspect curb islands and pipe bollards. Remove surface rust and repaint as needed.
Inspected & Maintained: [ ] OK [✓] Note comments/observations below.

Comments/Service Performed: To be performed at later date

4.14 Use blower to sweep debris from curb islands and concrete slab-on-grade.
Inspected & Maintained: [✓] OK [ ] Note comments/observations below.

Comments/Service Performed:

N/A 4.15 If canopy is present inspect roofing and clear roof drains of any debris.
Inspected & Maintained: [ ] OK [ ] Note comments/observations below.

Comments/Service Performed:

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:18 AM

SYSTEM STATUS REPORT

ALL FUNCTIONS NORMAL

PRESSURE LINE LEAK ALARM
@ 1:DIESEL
PLLD SHUTDOWN ALARM
AUG 26, 2009 11:06 AM

----- SENSOR ALARM -----
L 1:DIESEL STP SUMP
STP SUMP
FUEL ALARM
AUG 26, 2009 11:06 AM

PRESSURE LINE LEAK ALARM
@ 2:UNLEADED
PLLD SHUTDOWN ALARM
AUG 26, 2009 11:08 AM

----- SENSOR ALARM -----
L 2:UNLEADED STP SUMP
STP SUMP
FUEL ALARM
AUG 26, 2009 11:08 AM

IN-TANK SETUP

T 1:DIESEL
PRODUCT CODE : 1
THERMAL COEFF : .000450
TANK DIAMETER : 126.00
TANK PROFILE : 1 PT
FULL VOL : 20079
METER DATA : YES
END FACTOR: NONE
CAL UPDATE: NEVER

FLOAT SIZE: 4.0 IN.

WATER WARNING : 1.5
HIGH WATER LIMIT: 2.0

MAX OR LABEL VOL: 19976
OVERFILL LIMIT : 89%
: 17778
HIGH PRODUCT : 94%
: 18777
DELIVERY LIMIT : 39%
: 7990

LOW PRODUCT : 7500
LEAK ALARM LIMIT: 10
SUDDEN LOSS LIMIT: 25
TANK TILT :- 0.25
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
T#: NONE
LINE MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 39%
: 7990

LEAK MIN ANNUAL : 97%
: 19576

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM ENABLED

GROSS TEST FAIL
ALARM ENABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: ON

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN
STICK OFFSET :- 0.50
PUMP THRESHOLD : 10.00%

T 2:UNLEADED
PRODUCT CODE : 2
THERMAL COEFF : .000692
TANK DIAMETER : 119.50
TANK PROFILE : 1 PT
FULL VOL : 19976
METER DATA : YES
END FACTOR: NONE
CAL UPDATE: NEVER

FLOAT SIZE: 4.0 IN.

WATER WARNING : 1.5
HIGH WATER LIMIT: 2.0

MAX OR LABEL VOL: 19976
OVERFILL LIMIT : 89%
: 17778
HIGH PRODUCT : 94%
: 18777
DELIVERY LIMIT : 40%
: 7990

LOW PRODUCT : 7500
LEAK ALARM LIMIT: 10
SUDDEN LOSS LIMIT: 25
TANK TILT : 0.75
PROBE OFFSET : 0.00

SIPHON MANIFOLDED TANKS
T#: NONE
LINE MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 40%
: 7990

LEAK MIN ANNUAL : 98%
: 19576

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM ENABLED

GROSS TEST FAIL
ALARM ENABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: ON

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN
STICK OFFSET : 1.50
PUMP THRESHOLD : 10.00%

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:54 AM

PRESSURE LINE LEAK
TEST RESULTS

Q 1:DIESEL

3.0 GAL/HR RESULTS:

LAST TEST:
JUN 9,2010 9:22AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 18
SINCE MIDNIGHT : 11

0.20 GAL/HR RESULTS:

JUN	9,2010	2:02AM PASS
JUN	5,2010	10:53AM PASS
JUN	3,2010	9:34AM PASS
JUN	1,2010	4:40AM PASS
MAY	30,2010	11:44PM PASS
MAY	30,2010	7:30AM PASS
MAY	28,2010	5:43PM PASS
MAY	28,2010	2:31AM PASS
MAY	26,2010	9:35AM PASS
MAY	24,2010	1:52PM PASS

0.10 GAL/HR RESULTS:

MAR	12,2010	12:26AM PASS
SEP	10,2009	1:43AM PASS
MAR	10,2009	10:40AM PASS
SEP	5,2008	6:54AM PASS
MAR	6,2008	10:53AM PASS
FEB	23,2007	5:15PM PASS

Q 2:UNLEADED

3.0 GAL/HR RESULTS:

LAST TEST:
JUN 9,2010 10:45AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 21
SINCE MIDNIGHT : 14

0.20 GAL/HR RESULTS:

JUN	9,2010	8:33AM PASS
JUN	5,2010	10:16AM PASS
JUN	3,2010	5:47AM PASS
JUN	1,2010	5:47AM PASS
MAY	30,2010	6:33AM PASS
MAY	28,2010	5:24AM PASS
MAY	26,2010	8:34AM PASS
MAY	24,2010	10:00AM PASS
MAY	22,2010	8:14AM PASS
MAY	20,2010	5:26AM PASS

0.10 GAL/HR RESULTS:

MAR	13,2010	1:58PM PASS
SEP	10,2009	5:54PM PASS
MAR	10,2009	11:23AM PASS
SEP	5,2008	7:00PM PASS
MAR	6,2008	11:45AM PASS
FEB	23,2007	11:34PM PASS

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

PRESSURE LINE LEAK
TEST RESULTS

Q 1:DIESEL

3.0 GAL/HR RESULTS:

LAST TEST:
AUG 26,2009 9:58AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 22
SINCE MIDNIGHT : 18

0.20 GAL/HR RESULTS:

AUG 25,2009 6:48AM PASS
AUG 21,2009 11:58PM PASS
AUG 19,2009 4:47AM PASS
AUG 15,2009 9:30AM PASS
AUG 11,2009 10:08AM PASS
AUG 7,2009 9:27AM PASS
AUG 3,2009 8:54AM PASS
JUL 30,2009 9:28AM PASS
JUL 26,2009 4:10PM PASS
JUL 22,2009 7:32AM PASS

0.10 GAL/HR RESULTS:

MAR 10,2009 10:40AM PASS
SEP 5,2008 6:54AM PASS
MAR 6,2008 10:53AM PASS
FEB 23,2007 5:15PM PASS

Q 2:UNLEADED

3.0 GAL/HR RESULTS:

LAST TEST:
AUG 26,2009 10:57AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 16
SINCE MIDNIGHT : 6

0.20 GAL/HR RESULTS:

AUG 25,2009 7:12AM PASS
AUG 19,2009 10:54AM PASS
AUG 15,2009 11:32PM PASS
AUG 11,2009 5:55AM PASS
AUG 7,2009 8:58AM PASS
AUG 3,2009 7:01AM PASS
JUL 30,2009 11:48AM PASS
JUL 26,2009 3:11PM PASS
JUL 22,2009 9:44AM PASS
JUL 18,2009 4:33PM PASS

0.10 GAL/HR RESULTS:

MAR 10,2009 11:23AM PASS
SEP 5,2008 7:00PM PASS
MAR 6,2008 11:45AM PASS
FEB 23,2007 11:34PM PASS

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

LIQUID STATUS

AUG 26, 2009 11:05 AM

L 1:DIESEL STP SUMP
SENSOR NORMAL

L 2:UNLEADED STP SUMP
SENSOR NORMAL

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

INVENTORY REPORT

T 1:DIESEL
VOLUME = 15365 GALS
ULLAGE = 4611 GALS
90% ULLAGE= 2613 GALS
TC VOLUME = 15209 GALS
HEIGHT = 90.11 INCHES
STK HEIGHT= 89.86 INCHES
WATER VOL = 25 GALS
WATER = 1.05 INCHES
TEMP = 82.5 DEG F

T 2:UNLEADED
VOLUME = 13727 GALS
ULLAGE = 6249 GALS
90% ULLAGE= 4251 GALS
TC VOLUME = 13538 GALS
HEIGHT = 77.59 INCHES
STK HEIGHT= 78.34 INCHES
WATER VOL = 17 GALS
WATER = 0.76 INCHES
TEMP = 79.9 DEG F

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

CSLD TEST RESULTS

AUG 26, 2009 11:05 AM

T 1:DIESEL
PROBE SERIAL NUM 319111

0.2 GAL/HR TEST
PER: AUG 26, 2009 PASS

T 2:UNLEADED
PROBE SERIAL NUM 747888

0.2 GAL/HR TEST
PER: AUG 26, 2009 PASS

* * * * * END * * * * *

Attachment 6:
FMS Site Compliance Report

FMS Site Compliance Report

GVR ID: 261240 **Period:** 04/01/2010 to 04/30/2010

Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 05/01/2010 10:28 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	04/16/2010	0.2 GPH Monthly	76%	Passed
2	UNLEADED	04/16/2010	0.2 GPH Monthly	79%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	03/12/2010	0.1 GPH Annual	Passed
2	UNLEADED	03/13/2010	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 03/01/2010 to 03/31/2010
Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 04/29/2010 01:51 PM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	03/31/2010	0.2 GPH Monthly	60%	Passed
2	UNLEADED	03/31/2010	0.2 GPH Monthly	50%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	03/12/2010	0.1 GPH Annual	Passed
2	UNLEADED	03/13/2010	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240
Site Id: Benning

Period: 02/01/2010 to 03/01/2010

Customer: PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 03/01/2010 10:50 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	02/28/2010	0.2 GPH Monthly	58%	Passed
2	UNLEADED	02/27/2010	0.2 GPH Monthly	68%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	09/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	09/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 01/01/2010 to 02/01/2010

Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 03/01/2010 10:53 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	01/31/2010	0.2 GPH Monthly	56%	Passed
2	UNLEADED	01/31/2010	0.2 GPH Monthly	53%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	09/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	09/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240
Site Id: Benning

Period: 12/01/2009 to 12/31/2009

Customer: PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 01/01/2010 10:48 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	12/31/2009	0.2 GPH Monthly	55%	Passed
2	UNLEADED	12/31/2009	0.2 GPH Monthly	47%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	09/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	09/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240
Site Id: Benning

Period: 11/01/2009 to 12/01/2009

Customer: PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 12/01/2009 01:16 PM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	11/29/2009	0.2 GPH Monthly	62%	Passed
2	UNLEADED	11/29/2009	0.2 GPH Monthly	60%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	09/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	09/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 10/01/2009 to 10/31/2009

Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, VA 20019

Report Created: 11/01/2009 10:27 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	10/30/2009	0.2 GPH Monthly	68%	Passed
2	UNLEADED	10/30/2009	0.2 GPH Monthly	78%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	09/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	09/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 09/01/2009 to 09/30/2009

Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, DC 20019

Report Created: 10/01/2009 10:28 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	09/29/2009	0.2 GPH Monthly	61%	Passed
2	UNLEADED	09/29/2009	0.2 GPH Monthly	52%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	09/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	09/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 08/01/2009 to 08/31/2009

Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, DC 20019

Report Created: 09/01/2009 10:35 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	08/31/2009	0.2 GPH Monthly	62%	Passed
2	UNLEADED	08/31/2009	0.2 GPH Monthly	67%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	03/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	03/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests perfonned are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder–Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1–800–997–7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 07/01/2009 to 07/31/2009

Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, DC 20019

Report Created: 08/01/2009 10:27 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	07/31/2009	0.2 GPH Monthly	59%	Passed
2	UNLEADED	07/31/2009	0.2 GPH Monthly	57%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	03/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	03/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder-Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1-800-997-7725

FMS Site Compliance Report

GVR ID: 261240 **Period:** 06/01/2009 to 06/30/2009
Site Id: Benning **Customer:** PHI Service Company VRM
PO Box 9239
Newark, DE 19714

Site: PHI Service Company VRM # 1
3400 Benning Rd NE
Washington, DC 20019

Report Created: 07/01/2009 10:27 AM

Tank Release Detection Results

Tank	Product	Test Date	Type	Full Vol	Result
1	DIESEL	06/30/2009	0.2 GPH Monthly	63%	Passed
2	UNLEADED	06/30/2009	0.2 GPH Monthly	76%	Passed

Line Release Detection Results

Line	Product	Test Date	Type	Result
1	DIESEL	03/10/2009	0.1 GPH Annual	Passed
2	UNLEADED	03/10/2009	0.1 GPH Annual	Passed

This report documents tank and line tests performed at the above location for the indicated date and period.
This report and the tests performed are part of the PHI Service Company VRM monitoring and reporting program, and are intended to satisfy federal EPA UST release detection and record keeping requirements Fuel Logistics Services

Gilbarco Veeder–Root 7300 W. Friendly Avenue Greensboro, NC 27420 Telephone: 1–800–997–7725

Attachment 7:
Veeder-Root Line Leak Test Results

261240 PHI Bennina
3400 Bennina Road
WASHINGTON DC
SITE BENNING

JUN 9, 2010 11:54 AM

PRESSURE LINE LEAK
TEST RESULTS

Q 1:DIESEL

3.0 GAL/HR RESULTS:

LAST TEST:
JUN 9.2010 9:22AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 18
SINCE MIDNIGHT : 11

0.20 GAL/HR RESULTS:

JUN 9.2010 2:02AM PASS
JUN 5.2010 10:53AM PASS
JUN 3.2010 9:34AM PASS
JUN 1.2010 4:40AM PASS
MAY 30.2010 11:44PM PASS
MAY 30.2010 7:30AM PASS
MAY 28.2010 5:43PM PASS
MAY 28.2010 2:31AM PASS
MAY 26.2010 9:35AM PASS
MAY 24.2010 1:52PM PASS

0.10 GAL/HR RESULTS:

MAR 12.2010 12:26AM PASS
SEP 10.2009 1:43AM PASS
MAR 10.2009 10:40AM PASS
SEP 5.2008 6:54AM PASS
MAR 6.2008 10:53AM PASS
FEB 23.2007 5:15PM PASS

Q 2:UNLEADED

3.0 GAL/HR RESULTS:

LAST TEST:
JUN 9.2010 10:45AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 21
SINCE MIDNIGHT : 14

0.20 GAL/HR RESULTS:

JUN 9.2010 8:33AM PASS
JUN 5.2010 10:16AM PASS
JUN 3.2010 5:47AM PASS
JUN 1.2010 5:47AM PASS
MAY 30.2010 6:33AM PASS
MAY 28.2010 5:24AM PASS
MAY 26.2010 8:34AM PASS
MAY 24.2010 10:00AM PASS
MAY 22.2010 8:14AM PASS
MAY 20.2010 5:26AM PASS

0.10 GAL/HR RESULTS:

MAR 13.2010 1:58PM PASS
SEP 10.2009 5:54PM PASS
MAR 10.2009 11:23AM PASS
SEP 5.2008 7:00PM PASS
MAR 6.2008 11:45AM PASS
FEB 23.2007 11:34PM PASS

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

PRESSURE LINE LEAK
TEST RESULTS

Q 1:DIESEL

3.0 GAL/HR RESULTS:

LAST TEST:
AUG 26,2009 9:58AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 22
SINCE MIDNIGHT : 18

0.20 GAL/HR RESULTS:

AUG 25,2009 6:48AM PASS
AUG 21,2009 11:58PM PASS
AUG 19,2009 4:47AM PASS
AUG 15,2009 9:30AM PASS
AUG 11,2009 10:08AM PASS
AUG 7,2009 9:27AM PASS
AUG 3,2009 8:54AM PASS
JUL 30,2009 9:28AM PASS
JUL 26,2009 4:10PM PASS
JUL 22,2009 7:32AM PASS

0.10 GAL/HR RESULTS:

MAR 10,2009 10:40AM PASS
SEP 5,2008 6:54AM PASS
MAR 6,2008 10:53AM PASS
FEB 23,2007 5:15PM PASS

Q 2:UNLEADED

3.0 GAL/HR RESULTS:

LAST TEST:
AUG 26,2009 10:57AM PASS

NUMBER OF TESTS PASSED
PREV 24 HOURS : 16
SINCE MIDNIGHT : 6

0.20 GAL/HR RESULTS:

AUG 25,2009 7:12AM PASS
AUG 19,2009 10:54AM PASS
AUG 15,2009 11:32PM PASS
AUG 11,2009 5:55AM PASS
AUG 7,2009 8:58AM PASS
AUG 3,2009 7:01AM PASS
JUL 30,2009 11:48AM PASS
JUL 26,2009 3:11PM PASS
JUL 22,2009 9:44AM PASS
JUL 18,2009 4:33PM PASS

0.10 GAL/HR RESULTS:

MAR 10,2009 11:23AM PASS
SEP 5,2008 7:00PM PASS
MAR 6,2008 11:45AM PASS
FEB 23,2007 11:34PM PASS

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

LIQUID STATUS

AUG 26, 2009 11:05 AM

L 1:DIESEL STP SUMP
SENSOR NORMAL

L 2:UNLEADED STP SUMP
SENSOR NORMAL

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

INVENTORY REPORT

T 1:DIESEL
VOLUME = 15365 GALS
ULLAGE = 4611 GALS
90% ULLAGE= 2613 GALS
TC VOLUME = 15209 GALS
HEIGHT = 90.11 INCHES
STK HEIGHT= 89.86 INCHES
WATER VOL = 25 GALS
WATER = 1.05 INCHES
TEMP = 82.5 DEG F

T 2:UNLEADED
VOLUME = 13727 GALS
ULLAGE = 6249 GALS
90% ULLAGE= 4251 GALS
TC VOLUME = 13538 GALS
HEIGHT = 77.59 INCHES
STK HEIGHT= 78.34 INCHES
WATER VOL = 17 GALS
WATER = 0.76 INCHES
TEMP = 79.9 DEG F

* * * * * END * * * * *

261240 PHI Benning
3400 Benning Road
WASHINGTON DC
SITE BENNING

AUG 26, 2009 11:05 AM

CSLD TEST RESULTS

AUG 26, 2009 11:05 AM

T 1:DIESEL
PROBE SERIAL NUM 319111

0.2 GAL/HR TEST
PER: AUG 26, 2009 PASS

T 2:UNLEADED
PROBE SERIAL NUM 747888

0.2 GAL/HR TEST
PER: AUG 26, 2009 PASS

* * * * * END * * * * *

Attachment 8:
Proof of Financial Assurance

AEGIS

ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LIMITED

Endorsement No. 2 Effective Date of Endorsement October 31, 2009

Attached to and forming part of POLICY No. X2660A1A09

NAMED INSURED Pepco Holdings, Inc.

It is understood and agreed that this POLICY is hereby amended as indicated. All other terms and conditions of this POLICY remain unchanged.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

DECLARATIONS

Item UST1: A. Name of each covered location:
(See Section 3)

B. Address of each covered location:
(See Section 3)

Item UST2: Policy Number: X2660A1A09

Item UST3: Period of coverage: October 31, 2009 to October 31, 2010

Item UST4: A. Name of Insurer: Associated Electric & Gas Insurance Services Limited

B. Address of Insurer: One Church Street, P.O. Box HM2455, Hamilton, HMJX BERMUDA

Item UST5: A. Name of Insured: - Conectiv

- Potomac Electric Power Company

B. Address of Insured:
800 King Street
Wilmington, DE 19801

701 Ninth Street, N.W.
Washington, DC 20068

INSURING AGREEMENT

1. This Endorsement certifies that the POLICY to which the Endorsement is attached provides liability insurance covering the underground storage tank(s) listed in Section 3 to this Endorsement for taking corrective action and/or compensating third parties for BODILY INJURY and PROPERTY DAMAGE caused by accidental release; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the POLICY; arising from operating the underground storage tanks identified Section 3.

The limits of liability of the Insurer's liability are:

$1,000,000 each OCCURRENCE; and

$3,000,000 annual aggregate exclusive of legal defense costs, which are subject to a separate limit under the POLICY.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

This coverage is provided under POLICY No. X2660A1A09
The effective date of said POLICY is October 31, 2009

2. The insurance afforded with respect to such OCCURRENCES is subject to all of the terms and conditions of the POLICY; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):

   a. Bankruptcy or insolvency of the INSURED shall not relieve the Insurer of its obligations under the POLICY to which this Endorsement is attached.

   b. The Insurer is liable for the payment of amounts within any deductible applicable to the POLICY to the provider of corrective action or a damaged third-party, with a right of reimbursement by the INSURED for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102.

   c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the POLICY and all endorsements.

   d. Cancellation or any other termination of the insurance by the Insurer except for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the INSURED. Cancellation for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the INSURED.

   e. The insurance covers CLAIMS otherwise covered by the POLICY that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the POLICY except where the new or renewed POLICY has the same retroactive date or a retroactive date earlier than that of the prior POLICY, and which arise out of any covered OCCURRENCE that commenced after the POLICY retroactive date, if applicable, and prior to such POLICY renewal or termination date. CLAIMS reported during such extended reporting period are subject to the terms, conditions, limits, including Limits of Liability, and exclusions of the POLICY.

3.

Name of Covered Location	Address	Number of Tanks
Buzzard Point Generating Station	1st and V Street, SW Washington, DC 20024	2
Benning Generating Station	3400 Benning Road, NE Washington, DC 20019	4
Alabama Avenue Substation	3302 15th Street, SE Washington, DC 20032	1
National Geospatial Intelligence Agency	4600 Sangamore Road Bethesda, MD 20816	1
Morgantown Generating Station	P. O. Box Newburg, MD 29795	1
Forestville Service Center	8300 Old Marlboro Pike Upper Marlboro, MD 20772	6

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

Name of Covered Location	Address	Number of Tanks
Brighton Substation	1300 Brighton Dam Road Brookeville, MD 20833	1
Rockville Service Center	1600 Gaither Road Rockville, MD 20850	5
Pleasantville Operations	2542 Fire Road Egg Harbor Twp., NJ 08234	2
Glassboro Operations	428 Ellis Street Glassboro, NJ 08028	2
Winslow Operations	295 N. Grove Street Berlin, NJ 08009	2
Missouri Avenue Station	Missouri & Grant Aves. Atlantic City, NJ 08401	1
Bridgeton Operations	10 Cohansey Street Bridgeton, NJ 08202	2
Cape May Court House Operations	420 Route 9 North CMCH, NJ 08210	2
Carll's Corner Peaker Station	Burlington, & Central Rds. Carll's Corner, NJ 08234	5
Cedar Station	Rt. 9 Manahawkin, NJ 08050	3
Mickleton Station	Harmony Rd., E of Rt. 130 Mickleton, NJ 08056	2
West Creek	457 Main Street West Creek, NJ 08092	2
Middle Station	Railroad Station Rio Grande, NJ 08242	4
Deepwater Generating Station	373 N. Broadway Pennsville, NJ 08070	1
Midtown Thermal Control Center	1825 Atlantic Avenue Atlantic City, NJ	4
Centerville District Office	Route 213 & Route 18 Centerville, MD 21616	2
Control Center	10611 Westlake Drive Rockville, MD 20817	3

AEGIS

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97 (b) (1) and that the insurer is eligible to provide insurance as an excess or surplus lines insurer in one or more States.

AEGIS Insurance Services, Inc.
Authorized Representative of:
Associated Electric & Gas Insurance Services Limited
1 Meadowlands Plaza
East Rutherford, New Jersey 07073

Signature of Authorized Representative